

1 RENE L. VALLADARES
Federal Public Defender
2 Nevada State Bar No. 11479
AMY B. CLEARY
3 Assistant Federal Public Defender
411 E. Bonneville, Ste. 250
4 Las Vegas, Nevada 89101
(702) 388-6577/Phone
5 (702) 388-6261/Fax
6 Amy_Cleary@fd.org

7 Attorney for Benjamin Galecki

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 BENJAMIN GALECKI,

14 Defendant.
15
16

Case No. 2:15-cr-00285-APG-EJY-2

**Stipulation for Extension of Time
to File Defendant's Response to
the Government's Motion to
Substitute and Forfeit Property
(ECF No. 582)**

(Second Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between
18 Nicholas A. Trutanich, United States Attorney, and Daniel D. Hollingsworth,
19 Assistant United States Attorney, counsel for the United States of America, and
20 Rene L. Valladares, Federal Public Defender, and Amy B. Cleary, Assistant
21 Federal Public Defender, counsel for Defendant Benjamin Galecki, that the
22 response to the Government's Motion to Substitute and Forfeit Property
23 currently due on November 13, 2020, be vacated and continued and reset for
24 February 11, 2021.

25 This Stipulation is entered into for the following reasons:
26

1. Defense counsel requires additional time to effectively and thoroughly investigate this case before filing a response. Defense counsel received Mr. Galecki's physical file from his prior counsel a bit later than expected and is still in the process of having Mr. Galecki's physical file scanned so it may be reviewed. As defense counsel and her staff are teleworking due to the COVID-19 pandemic, additional time is necessary for this process. Furthermore, as the forfeiture issues derive from the trial record, defense counsel must carefully review the trial proceedings before submitting a response.

2. The parties agree to the continuance and extension of time.

This is the second request for an extension of time.

DATED this 10th day of November 2020.

RENE L. VALLADARES
Federal Public Defender

NICHOLAS A. TRUTANICH
United States Attorney

By /s/ Amy B. Cleary
AMY B. CLEARY
Assistant Federal Public Defender

By /s/ Daniel D. Hollingsworth
DANIEL D. HOLLINGSWORTH
Assistant United States Attorney

IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE

DATED: November 10, 2020